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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
13

14 UNITED STATES OF AMERICA,)	Case No. CR 11-0625 EMC
)	
15 Plaintiff,)	STIPULATION AND [PROPOSED]
)	PROTECTIVE ORDER
16 v.)	
)	
17 BASSAM YACOUB SALMAN,)	
a/k/a Bassam Jacob Salman,)	
)	
18 Defendant.)	
19 _____)	

20
21 STIPULATION

22 The United States and the defendant in this action, through undersigned counsel, hereby stipulate
23 and agree as follows:

24 1. The United States is prepared to produce to the defendant witness statements and reports
25 governed by 18 U.S.C. § 3500, including grand jury testimony, in advance of trial.

2. Federal Rule of Criminal Procedure 6(e)(3)(E) provides that the Court “may authorize disclosure – at a time, in a manner, and subject to any other conditions that it directs – of a grand-jury matter: (i) preliminary to or in connection with a judicial proceeding.” The parties request that the Court issue an order authorizing such disclosure.

3. Possession of copies of the witness statements and reports shall be limited to the defendant and his attorneys, including any investigators, paralegals, law clerks, assistants, and other persons who are within the attorney-client privilege (hereinafter collectively referred to as “members of the defense team”). The defendant, his attorneys, and members of his defense team shall use the witness statements and reports only for the purpose of defending against the allegations in the Indictment. The defendant, his attorneys, and members of his defense team shall not provide copies of the witness statements and reports to other persons.

4. At the conclusion of this proceeding, the defendant, his attorneys, and members of his defense team shall return to the government all copies of the witness statements and reports.

STIPULATED AND AGREED TO:

DATED: April 23, 2013

MELINDA HAAG
United States Attorney

_____/s/_____
ADAM A. REEVES
ROBERT S. LEACH
Assistant United States Attorneys

DATED: April 23, 2013

LAW OFFICES OF GAIL SHIFMAN

_____/s/_____
GAIL SHIFMAN, ESQ.
Counsel for Defendant
Bassam Yacoub Salman

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